

# **EXHIBIT B**

**akerman**

Jason D. St. John

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July 8, 2019

**VIA FEDEX**

Mr. Mario Castro  
419 West Hills Road  
Melville, NY 11747

**Re: Notice to the Court of Presentment**  
***Mario E. Castro v. The Bank of New York Mellon, et al.***  
**Case No. 2:17-cv-04375-JS-GRB (U.S. District Court, Eastern Dist. of N.Y.)**

Dear Mr. Castro:

As you know, we represent defendants The Bank of New York Mellon f/k/a The Bank of New York, as Trustee for the Certificate Holders of CWALT, Inc., Alternative Loan Trust 2006-OA11 Mortgage Pass-Through Certificates Series 2006-OA11 (**BoNYM**) and NewRez LLC d/b/a Shellpoint Mortgage Servicing (**Shellpoint**) in the above-referenced action. We received your Arbitration Hearing Notification and related documents, dated June 25, 2019. We received documents from "Sitcomm Arbitration Association".

The papers purport to give notice of an arbitration hearing to be held on July 6, 2019, at 12:00 p.m. Central time, although the papers do not state where the arbitration is to be held. And it is not clear what the topic of the arbitration would be. I note the papers refer to a Contract number "2019-01091221MMLJC-WBF4UJCSM-U123899811" and addendum number "2019-0211M1221MMLJC-WBF4UJCSM-ADDEN1." My clients are not aware of such a contract. And you do not attach a copy of the contract. Therefore, your notice of arbitration and all papers provided with it are nullities, and BoNYM and Shellpoint will not take any further action with regard to them.

As we have explained previously, neither BoNYM nor Shellpoint has ever made you any offer, and so you cannot accept any offer, nor has BoNYM or Shellpoint ever given "tacit acquiescence" to any alleged offer. We refer you to the prior letters to you from our office dated January 18, 2019, February 26, 2019, March 22, 2019, and March 26, 2019. We have reviewed the Arbitration Hearing Notification but do not think it is binding upon BoNYM or Shellpoint, and respectfully refer to the jurisdiction of the United States District Court for the Eastern District of New York to settle this dispute.

Mr. Mario Castro

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Please feel free to contact me with any questions.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason D. St. John". The signature is fluid and cursive, with the first name "Jason" and last name "St. John" clearly distinguishable.

Jason D. St. John

Donovan, Noreen (LAA-NY)

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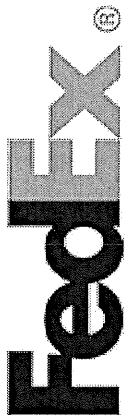
NOREEN DONOVAN  
Akerman LLP  
New York, NY 10103  
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Initiated

Scheduled delivery:  
Tue, 7/9/2019 by 10:30  
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Mr. Mario Castro  
419 W HILLS RD  
MELVILLE, NY 11747  
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### Shipment Facts

Tracking number:	<u>788346407470</u>
Reference:	067261.0329805-5524
Service type:	FedEx Priority Overnight®
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